Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-305 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Lear Corporation - Strasburg

Facility Name: Lear Corporation - Strasburg

Facility Location: East Queen Street

Strasburg, Virginia

Registration Number: 80964

Permit Number: VRO80964

May 21, 2001

Effective Date

May 26, 2006

Expiration Date

Director, Department of Environmental Quality

May 21, 2001

Signature Date

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I. Facility Information

Permittee

Lear Corporation - Strasburg P. O. Box 181 Strasburg, Virginia 22657

Responsible Official

Mr. Thomas Bee General Manager

Facility

Lear Corporation - Strasburg East Queen Street Strasburg, Virginia 22657

Contact Person

Mr. Bryan Winter Safety and Environmental Compliance Manager (540) 465-3741 extension 404

NET Identification Number: 51-171-0058

Facility Description:

SIC 3089 – Plastics Products, Not Elsewhere Classified

Lear Corporation is involved in the manufacturing of plastic automotive interior trim components. Manufacturing processes include: painting, injection molding, foam production, adhesive application, and rotocast machines.

II. Emission Units

Equipment to be operated consists of:

| Emission Unit ID | Stack ID | Emission Unit Description | Size/Rated Capacity* | Pollution Control Device (PCD) Description | PCD ID | Pollutant Controlled | Applicable Permit Date | |
|---------------------|-------------|--|----------------------------|--|------------------------|-------------------------|---------------------------|--|
| Plant 1 | | | | | | | | |
| PL1-PAINT | 1-4 1-6 | Two Painting Spray Booths, Each Equipped with a 0.16 | 5 gal/hr | Water Curtain or Dispo Cloth Filter | PL1-WC2 | PM PM-10 | 10/20/1986 | |
| 1 | 1-0 | mmBTU/hr Drying Oven | | Sunkiss Thermoreactor | PL1-PTF- CAT | VOC | | |
| INC-1 | 1-8 | Smoketroll Incinerator | 1000 lb/hr | - | ı | - | 5/13/1977 | |
| PL1-MAINT | 1-13 | Binks Sames Series 2100 Industrial Floor Spray Booth | 10 gal/week | AF Paper Filter | PL1- MAINT- FILT | PM PM-10 | 6/5/1998 | |
| PL1-PBP90 | 1-90 | ITW Binks Paint Spray Booth With Four HVLP Spray Guns | 6.4 gal/hr | Dry Filters | Pl1-PBP90- FILT | PM PM-10 | 5/3/2001 | |
| Plant 2 | | | | | | | | |
| PL2-PAINT | 2-1 | Paint Line equipped with Two (2) HVLP guns and a Drying Oven | 5 gal/hr | Water Curtain or Dispo Cloth Filter | PL2-WC1 | PM PM-10 | - | |
| НСО | 2-11 | Armature Coil Equipment, Inc. Heat Cleaning Oven Model 260-RKG | 60 lbs/hr (dried paint) | Direct Flame Afterburner | PL2-AB | PM PM-10 | 2/19/1998 | |
| PL2-GB1- | 2-15 | Water-based Gluing Line 1 | 252 marta/hr | AF Paper Filter | PL2-GLUE- FILT | PM PM-10 | 6/5/1998 | |
| Line 1 | 2-13 | HVLP guns [part of GMX130 manufacturing process] | 252 parts/hr | Infrared Oven | PL2-LINE1- CAT | VOC | 0/3/1996 | |
| PL2-GB2- | 2-16 | Water-based Gluing Line 1 | 252 parts/hr | AF Paper Filter | PL2-GLUE- FILT | PM PM-10 | 6/5/1998 | |
| Line 1 | 2-10 | HVLP guns [part of GMX130 manufacturing process] | 232 parts/fir | Infrared Oven | PL2-LINE1- CAT | VOC | 0/3/1990 | |

| Emission Unit ID | Stack ID | Emission Unit Description | Size/Rated Capacity* | Pollution Control Device (PCD) Description | PCD ID | Pollutant Controlled | Applicable Permit Date |
|---------------------|-------------|--|-------------------------|--|---------------------|-------------------------|---------------------------|
| PL2-GB1- | 2-17 | Water-based Gluing Line 2 | 252 parts/hr | AF Paper Filter | PL2-GLUE- FILT | PM PM-10 | 6/5/1998 |
| Line 2 | 2-17 | HVLP guns [part of GMX130 manufacturing process] | 232 parts/iii | Infrared Oven | PL2-LINE2- CAT | VOC | 0/3/1990 |
| PL2-GB2- | 2-18 | Water-based Gluing Line 2 | 252 parts/hr | AF Paper Filter | PL2-GLUE- FILT | PM PM-10 | 6/5/1998 |
| Line 2 | 2-16 | HVLP guns [part of GMX130 manufacturing process] | 232 parts/iii | Infrared Oven | PL2-LINE2- CAT | VOC | 0/3/1998 |
| Plant 4 | | | | | | | |
| PL4-TCH-UP | 4-5 | Touch-Up Paint Booth | 0.88 oz/hr | AF Paper Filter | PL4-TCH- UP-FILT | PM PM-10 | - |
| Miscellaneous | | | | | | | |
| SK1 | - | Degreaser utilizing Safety Kleen | - | - | - | - | - |
| MOLD-CLN | - | Mold Cleaning | - | - | - | - | - |
| Paint-CLN | - | Safety Kleen Paint Line Cleaners | - | - | - | - | - |

^{*}The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Plant 1 Equipment Requirements

A. Limitations

- Particulate emissions from the paint spray booths (Unit PL1-PAINT F) shall be controlled by either paper filters or a water curtain.
 (9 VAC 5-80-110)
- 2. The paint coating line (Unit PL1-PAINT F) shall not operate more than 6,240 hours per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-110 and Condition 4 (Part I) of 10/20/1986 Permit)
- 3. Volatile Organic Compound (VOC) emissions from the operation of the paint coating line (Unit PL1-PAINT F) shall not exceed 9.23 tons per year or an average of 2.95 pounds per hour. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 5 (Part I) of 10/20/1986 Permit)

- 4. Visible emissions from the paint spray booth stacks (Unit PL1-PAINT F) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. (9 VAC 5-50-80 and 9 VAC 5-80-110)
- 5. The approved fuels for the incinerator (Unit INC-1) are #2 fuel oil and propane. (9 VAC 5-80-110 and 5/13/1977 Permit)
- 6. Particulate emissions from the incinerator (Unit INC-1) shall be controlled by an afterburner.

(9 VAC 5-80-110)

7. Particulate emissions from the incinerator (Unit INC-1) shall not exceed 0.14 grains per standard cubic foot of dry flue gas corrected to 12% carbon dioxide (without the contribution of auxiliary fuel).

(9 VAC 5-40-750 and 9 VAC 5-80-110)

8. Visible emissions from the incinerator stack (Unit INC-1) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

(9 VAC 5-40-760, 9 VAC 5-50-80, and 9 VAC 5-80-110)

9. Particulate emissions from the maintenance spray booth (Unit PL1-MAINT) shall be controlled by paper filters.

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10. VOC emissions from the operation of the maintenance spray booth (Unit PL1-MAINT) shall not exceed 1.3 tons per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 8 of 6/5/1998 Permit)

11. Visible emissions from the maintenance spray booth stack (Unit PL1-MAINT) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 9 of 6/5/1998 Permit)

- 12. Particulate emissions from the paint spray booth (Unit PL1-PBP90) shall be controlled by dry filters. The spray booth shall be equipped with a device to continuously measure the differential pressure drop through the spray booth filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. (9 VAC 5-80-110 and Condition 3 of 5/3/2001 Permit)
- 13. VOC emissions from the paint spray booth (Unit PL1-PBP90) shall be minimized by the use of high-volume, low-pressure (HVLP) spray guns. An HVLP spray gun is one that operates at 10.0 psig of atomizing air pressure or less at the air cap. (9 VAC 5-80-110 and Condition 4 of 5/3/2001 Permit)
- 14. VOC emissions from the coatings, thinners, and cleaners utilized in the paint spray booth (Unit PL1-PBP90) are limited to 3.0 pounds VOC per gallon (less water and exempt solvents), as applied, calculated as a monthly weighted average. (9 VAC 5-80-110 and Condition 5 of 5/3/2001 Permit)
- 15. The paint spray booth (Unit PL1-PBP90) shall not apply more than a combined total of 20,000 gallons of coatings per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 8 of 5/3/2001 Permit)

16. VOC emissions from the operation of the paint spray booth (Unit PL1-PBP90) shall not exceed 15.3 tons per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 9 of 5/3/2001 Permit)

- 17. Visible emissions from the paint spray booth (Unit PL1-PBP90) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). (9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 10 of 5/3/2001 Permit)
- 18. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-schedule maintenance. These records shall be maintained on site for a period of five years, and shall be made available to DEQ personnel upon request.
- b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-80-110, Condition 15 of 6/5/1998 Permit, and Condition 16 of 5/3/2001 Permit)

- 19. All air pollution control equipment operators for the paint spray booths (Unit PL1-PAINT F) will be trained in the proper operation of all such equipment. The permittee will maintain records of the required training and certification. Certification of training shall consist of a statement of time, place, and nature of training provided.
 - (9 VAC 5-80-110 and Condition 5 (Part II) of 10/20/1986 Permit)
- 20. The permittee will develop, maintain, and have available to all operators good written operating procedures for all air pollution control equipment on the paint spray booths (Unit PL1-PAINT F). A maintenance schedule for all such equipment will be established and made available to the DEQ for review. Records of service and maintenance will be maintained on file by the source for a period of five years. (9 VAC 5-80-110 and Condition 6 (Part II) of 10/20/1986 Permit)

B. Monitoring

- 1. The permittee shall perform inspections of the paint spray booths (Unit PL1-PAINT F), the maintenance spray booth (Unit PL1-MAINT), and the paint spray booth (Unit PL1-PBP90) each day of operation. The inspections shall include a check of correct filter placement and filter condition. All observations and corrective actions taken shall be recorded.
 - (9 VAC 5-80-110)
- 2. For the purpose of calculating VOC emissions from the paint spray booths (Unit PL1-PAINT F), the VOC content of each coating, as applied, each thinner, and each cleaning solvent shall be based on formulation data as shown on its certified Material Safety Data Sheet (MSDS). If the VOC content is given as a range, the maximum value shall be used.
 - (9 VAC 5-80-110)
- 3. The permittee shall determine compliance with the VOC limit in Condition III.A.3. as follows:
 - a. To determine annual emissions of VOC from coating, thinner, and cleaning solvent usage:

$$E = \sum_{i=1}^{n} C_i G_i$$

..... Equation 1

Where:

 $E = \begin{array}{c} VOC \ emission \ rate \ of \ the \ paint \ coating \ line \ [Unit \ PL1-PAINT \ F] \\ (lb/time \ period) \end{array}$

 $\begin{array}{ll} VOC \ content \ of \ each \ material \ [including \ coatings, \ thinners, \ and \ cleaning \\ C_i &= solvents \] \ (i) \ applied \ in \ the \ paint \ coating \ line \ [Unit \ PL1-PAINT \ F] \ during \ the \\ time \ period \ (lb/gal) \end{array}$

Number of gallons of each material [including coatings, thinners, and G_i = cleaning solvents] (i) applied in the paint coating line [Unit PL1-PAINT F] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

b. To calculate average hourly emission rates:

$$PE = \frac{E}{H}$$

Equation 2

Where:

PE = average hourly VOC emission rate of the paint coating line [Unit PL1-PAINT F] (lb/hour)

E = VOC emission rate of the paint coating line [Unit PL1-PAINT F] (lb/month)

H = hours of operation of the paint coating line [Unit PL1-PAINT F] (hr/month)

Average hourly VOC emissions shall be calculated once each month.

4. The permittee shall determine compliance with the VOC limit in Condition III.A.14. as follows:

$$AC = \frac{\sum_{i=1}^{n} C_i G_i}{\sum_{i=1}^{n} G_i}$$

..... Equation 3

Where:

AC = average VOC content of materials [including coatings, thinners, and cleaning solvents] for the paint spray booth [Unit PL1-PBP90] (lb/gal)

VOC content of each material [including coatings, thinners, and cleaning C_i = solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during each month (lb/gal)

number of gallons of each material [including coatings, thinners, and G_i = cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during each month (gal)

Average VOC content shall be calculated once each calendar month. (9 VAC 5-80-110)

- 5. The permittee shall perform periodic monitoring of the incinerator stack (Stack 1-8) as follows:
 - a. Conduct weekly inspections of the stack to determine the presence of visible emissions. If during the inspection, visible emissions are observed, a visible emission evaluation (VEE) shall be conducted in accordance with 40 CFR 60, Appendix A, EPA Method 9. The VEE shall be conducted for a minimum of six minutes. If any of the observations exceed 20%, the VEE shall be conducted for a total of 60 minutes.
 - b. If the results of any VEE exceed the standard in Condition III.A.8., a performance test shall be conducted for particulate matter (PM) on the stack in accordance with 40 CFR 60, Appendix A, EPA Method 5. The tests shall be performed and demonstrate compliance with the standard contained in Condition III.A.7. within 90 days of the exceedance of the opacity standard or within one calendar year of the previous stack test, whichever occurs later. The details of the test are to be arranged with the Director, Valley Region. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the Director, Valley Region, within 45 days after test completion and shall conform to the test report format enclosed with this permit.

(9 VAC 5-80-110)

- 6. When a performance test for particulate matter is required by Condition III.B.5.b., a concurrent VEE shall be conducted in accordance with 40 CFR 60, Appendix A, EPA Method 9 by the permittee on the incinerator stack. Each test shall consist of 30 sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the test are to be arranged with the Director, Valley Region. The permittee shall submit a test protocol at least 30 days prior to testing. Should conditions prevent concurrent opacity observations, the Director, Valley Region, shall be notified in writing, within seven days, and visible emissions testing is to be rescheduled within 30 days. Rescheduled testing is to be conducted under the same conditions (as possible) as the performance tests. Two copies of the test result shall be submitted to the Director, Valley Region, within 45 days after test completion and shall conform to the test report enclosed with this permit. (9 VAC 5-80-110)
- 7. For the purpose of calculating coating VOC emissions from the paint spray booth (Unit PL1-PBP90), the VOC content of each coating, as applied, each thinner, and each cleaning solvent shall be based on formulation data as shown on its certified Material Safety Data Sheet (MSDS). If the VOC content is given as a range, the maximum value shall be used. (9 VAC 5-80-110)
- 8. The permittee shall determine compliance with the VOC limit in Condition III.A.16. as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

..... Equation 4

Where:

E = VOC emission rate of the paint spray booth [Unit PL1-PBP90] (lb/time period)

VOC content of each material [including coatings, thinners, and cleaning

C_i = solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during the time period (lb/gal)

number of gallons of each material [including coatings, thinners, and $G_i \quad = \quad \begin{array}{ll} \text{cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90]} \\ \text{during each month (gal)} \end{array}$

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

9. The permittee shall determine compliance with the VOC limit in Condition III.A.10. as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

..... Equation 5

Where:

E = VOC emission rate of the maintenance spray booth [Unit PL1-MAINT] (lb/time period)

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number of gallons of each material [including coatings, thinners, and $G_i \quad = \quad \begin{array}{ll} \text{cleaning solvents}] \text{ (i) applied in the maintenance spray booth [Unit PL1-MAINT] during each month (gal)} \\ \end{array}$

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- 1. Inspection records as required by Condition III.B.1.
- 2. Monthly and annual coating, thinner, and cleaning solvent throughputs to the paint spray line (Unit PL1-PAINT F). Annual throughputs shall be calculated monthly as the sum of each consecutive 12 month period.
- 3. Monthly and annual VOC emissions from the paint spray line (Unit PL1-PAINT F). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- 4. Certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the paint spray line (Unit PL1-PAINT F). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent.
- 5. Monthly calculations showing the average hourly VOC emissions from the paint spray line (Unit PL1-PAINT F).
- 6. Hours of operation of the paint spray line (Unit PL1-PAINT F) on a monthly basis.
- 7. Annual throughput of material to the incinerator (Unit INC-1). Annual throughput shall be calculated monthly as the sum of each consecutive 12 month period.
- 8. Annual throughput of #2 fuel oil and propane to the incinerator (Unit INC-1). Annual throughput shall be calculated monthly as the sum of each consecutive 12 month period.
- 9. A log of weekly inspections and the results of all VEE performed on the incinerator stack (Stack 1-8) as required in Condition III.B.5.

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10. Monthly and annual coating, thinner, and cleaning solvent throughputs to the maintenance spray booth (Unit PL1-MAINT). Annual throughputs shall be calculated monthly as the sum of each consecutive 12 month period.

- 11. Monthly and annual VOC emissions from the maintenance spray booth (Unit PL1-MAINT). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- 12. Certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the maintenance spray booth (Unit PL1-MAINT). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent.
- 13. Total monthly and annual throughput of all coatings used in the paint spray booth (Unit PL1-PBP90). Annual throughput shall be calculated monthly as the sum of each consecutive 12 month period.
- 14. Total monthly and annual paint thinner and cleaner throughputs used in the paint spray booth (Unit PL1-PBP90). Annual throughput shall be calculated monthly as the sum of each consecutive 12 month period.
- 15. Monthly weighted average VOC content of all coatings, all thinners, and all cleaners (in pounds per gallon less water and exempt solvent) used in the paint spray booth (Unit PL1-PBP90) based on the highest VOC content of all coatings, all thinners, and all cleaners.
- 16. Monthly and annual VOC emissions from the paint spray booth (Unit PL1-PBP90) based on the highest VOC content of all coatings, all thinners, and all cleaners used in the paint spray booth. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- 17. Certified MSDS sheets or other vendor information showing VOC content, toxic compound content, water content, and solids content for each coating, thinner, and cleaner used in the paint spray booth (Unit PL1-PBP90). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent.
- 18. Monthly calculations showing the average VOC content of coating used in the paint spray booth (Unit PL1-PBP90).
- 19. Records as required by Condition III.A.18.
- 20. Records as required by Condition III.A.19.

21. Records as required by Condition III.A.20.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, Condition 4 (Part II) of 10/20/1986 Permit, Condition 11 of 6/5/1998 Permit, and Condition 12 of 5/3/2001 Permit)

D. Testing

- 1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
 - (9 VAC 5-50-30, 9 VAC 5-80-110, Condition 3 (Part II) of 10/20/1986 Permit, Condition 3 of 6/5/1998 Permit, and Condition 6 of 5/3/2001 Permit)
- 2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method (40 CFR Part 60, Appendix A) |
|------------------|---|
| VOC | EPA Methods 18, 25, 25a |
| VOC Content | EPA Methods 24, 24a |
| PM/PM-10 | EPA Methods 5, 17 |
| Visible Emission | EPA Method 9 |

(9 VAC 5-80-110)

E. Reporting

The permittee shall submit reports to the Director, Valley Region, within 15 days after the end of the semi-annual period. Each semi-annual report shall contain, at minimum, the dates included in the semi-annual period and the following:

- 1. Monthly and rolling 12 month emissions of VOC (in tons) from the paint spray booths (Unit PL1-PAINT F).
- 2. Average hourly VOC emissions from the paint spray booths (Unit PL1-PAINT F) for each month of operation during the semiannual period.
- 3. Coatings utilized, including VOC content of each, in the paint spray booths (Unit PL1-PAINT F) during the semi-annual period.

(9 VAC 5-80-110 and Condition 6 (Part I) of 10/20/1986 Permit)

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IV. Plant 2 Equipment Requirements

A. Limitations

Particulate emissions from the paint line (Unit PL2-PAINT) shall be controlled by either cloth filters or a water curtain.
 (9 VAC 5-80-110)

2. Total Suspended Particulates and PM-10 emissions from the heat cleaning oven (Unit HCO) shall be controlled by a minimum 1600°F afterburner. The afterburner shall be equipped with a continuous temperature monitor. The heat cleaning oven shall be equipped with a device which prevents firing of the primary chamber until the minimum afterburner temperature is attained. The afterburner shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 3 of 2/19/1998 Permit)

- 3. The approved fuel for the afterburner (Unit HCO) is natural gas. A change in the fuel may require a minor new source review permit to modify and operate. (9 VAC 5-80-110 and Condition 4 of 2/19/1998 Permit)
- 4. Emissions from the operation of the heat cleaning oven (Unit HCO) shall not exceed the limitations specified below:

Total Suspended Particulate 0.02 gr/dscf @ 12% CO₂ or 7% O₂

PM-10 0.02 gr/dscf @ 12% CO₂ or 7% O₂

(9 VAC 5-80-110 and Condition 7 of 2/19/1998 Permit)

5. Particulate emissions from the four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall be controlled by dry filters. The glue application spray booths shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 4 of 6/5/1998 Permit)

6. Each glue application spray booth (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall be equipped with a device to continuously measure the differential pressure drop through the spray booth filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in working order at all times.

(9 VAC 5-80-110 and Condition 4 of 6/5/1998 Permit)

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7. VOC emissions from glue application and curing (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall be controlled by the use of HVLP spray guns and waterborne glue in the four glue application spray booths. An HVLP spray gun is one that operates at 10.0 psig of atomizing air pressure or less at the air cap. The monthly average glue VOC content shall not exceed 0.4 pound per gallon coating as applied.

(9 VAC 5-80-110 and Condition 5 of 6/5/1998 Permit)

8. The four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall not apply more than 176,600 gallons of glue coating per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 6 of 6/5/1998 Permit)

9. Emissions from the GMX130 process (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall not exceed the limits specified below:

| Total Suspended Particulate | 20.8 lbs/day | 3.8 tons/yr |
|------------------------------|----------------|--------------|
| PM-10 | 20.8 lbs/day | 3.8 tons/yr |
| Volatile Organic Compound | 6166 lbs/month | 36.3 tons/yr |

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 7 of 6/5/1998 Permit)

10. Visible emissions from the paint line stack (Unit PL2-PAINT) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

(9 VAC 5-50-80 and 9 VAC 5-80-110)

- 11. Visible emissions from the heat cleaning oven (Unit HCO) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). (9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 8 of 2/19/1998 Permit)
- 12. Visible emissions from the curing oven exhaust[s] (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). (9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 9 of 6/5/1998 Permit)

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13. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-schedule maintenance. These records shall be maintained on site for a period of five years, and shall be made available to DEQ personnel upon request.
- b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-80-110, Condition 14 of 2/19/1998 Permit, and Condition 15 of 6/5/1998 Permit)

14. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training, and nature of training.

(9 VAC 5-80-110 and Condition 15 of 2/19/1998 Permit)

B. Monitoring

- 1. The permittee shall perform inspections of the paint line (Unit PL2-PAINT) and the glue application booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) each day of operation. The inspections shall include a check of correct filter placement and filter condition. All observations and corrective actions taken shall be recorded.
 - (9 VAC 5-80-110)
- 2. The permittee shall conduct visible emission inspections on the heat cleaning oven stack (Stack 2-11) in accordance with the following procedures and frequencies:
 - a. At a minimum of once per week, the permittee shall determine the presence of visible emissions. If during the inspection, visible emissions are observed, timely corrective action shall be taken such that the stack resumes operation with no visible emissions.
 - b. All visible emissions inspections shall be performed when the equipment is operating.
 - c. If visible emissions inspections conducted during 12 consecutive weeks show no visible emissions for a particular stack, the permittee may reduce the monitoring frequency to once per month for the stack. Anytime the monthly visible

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emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week for the stack.

All observations and corrective actions taken shall be recorded. (9 VAC 5-80-110)

- 3. For the purpose of calculating coating VOC emissions from glue application (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2), the VOC content of each coating, as applied, shall be based on formulation data as shown on its certified Material Safety Data Sheet (MSDS). If the VOC content is given as a range, the maximum value shall be used. (9 VAC 5-80-110)
- 4. The permittee shall determine compliance with the VOC limit in Condition IV.A.7. as follows:

$$AC = \frac{\sum_{i=1}^{n} C_i G_i}{\sum_{i=1}^{n} G_i}$$

..... Equation 6

Where:

average VOC content of glue coatings applied in the four glue application AC = spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/gal)

 $\begin{array}{ll} VOC \ content \ of \ each \ coating \ (i) \ applied \ in \ the \ four \ glue \ application \ spray \\ C_i &= booths \ [Units \ PL2-GB1-Line \ 1, \ PL2-GB2-Line \ 1, \ PL2-GB1-Line \ 2, \ and \ PL2-GB2-Line \ 2] \ during \ each \ month \ (lb/gal) \end{array}$

number of gallons of each coating (i) applied in the four glue application

G_i = spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] during each month (gal)

Average VOC content shall be calculated once each calendar month. (9 VAC 5-80-110)

5. The permittee shall determine compliance with the VOC limits in Condition IV.A.9. as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

..... Equation 7

Where:

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VOC emission rate from the four glue application spray booths [Units PL2-E = GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line

2](lb/time period)

VOC content of each coating (i) applied in the four glue application spray

C_i = booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (lb/gal)

number of gallons of each coating (i) applied in the four glue application

G_i = spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-110)

- 6. The permittee shall determine compliance with the particulate emission limits in Condition IV.A.9 as follows:
 - a. To calculate particulate emissions on a monthly or annual basis:

$$E = \left(\sum_{i=1}^{n} P_i G_i D_i\right) \left(\frac{100 - T}{100}\right) \left(\frac{100 - CE}{100}\right)$$

..... Equation 8

Where:

E = particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/time period)

P_i = solids content of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] during the time period (lb solids/lb paint)

G_i = number of gallons of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (gal)

D_i = density of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (lb/gal)

T = transfer efficiency of each glue application spray booth [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (%)

= 50 [unless records demonstrate a higher value is appropriate]

CE = control efficiency of the filter on each of the four glue application spray booths

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[Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2](%)

= 85 [unless records demonstrate a higher value is appropriate]

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

b. To calculate average daily emission rates:

$$PE = \frac{E}{H}$$

..... Equation 9

Where:

PE = average daily particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/day)

E = particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/month)

H = combined days of operation of the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (day/month)

Average daily particulate emissions shall be calculated once each month.

(9 VAC 5-80-110)

7. The permittee shall determine VOC emissions from the paint line (Unit PL2-PAINT) as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

..... Equation 10

Where:

E = VOC emission rate of the paint line [Unit PL2-PAINT] (lb/time period)

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number of gallons of each material [including coatings, thinners, and G_i = cleaning solvents] (i) applied in the paint line [Unit PL2-PAINT] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period. (9 VAC 5-80-110)

C. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- 1. Monthly and annual throughput of coatings, thinners, and cleaning solvents to the paint line (Unit PL2-PAINT), calculated monthly as the sum of each consecutive 12 month period.
- 2. Inspection records as required by Condition IV.B.1.
- 3. Monthly and annual VOC emissions from the paint line (Unit PL2-PAINT). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- 4. Certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the paint line (Unit PL2-PAINT). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent.
- 5. Annual throughput of natural gas to the heat cleaning oven (Unit HCO), calculated monthly as the sum of each consecutive 12 month period.
- 6. For each batch in the heat cleaning oven (Unit HCO), the permittee shall record the date, time, and afterburner temperature.
- 7. Inspection records as required by Condition IV.B.2.
- 8. Monthly and annual VOC emissions from glue application and curing (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

- 9. Monthly and annual glue throughput for glue application (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2). Annual throughput shall be calculated monthly as the sum of each consecutive 12 month period.
- 10. Certified MSDS sheets showing coating name, solids content, and VOC content in pounds per gallon of coating for each coating used in glue application (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2). VOC content for water based coatings shall be established using mass balance calculations or DEQ approved equivalent.
- 11. Average daily, monthly, and annual particulate emissions from the four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2). Average daily emissions shall be calculated monthly. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- 12. Days of operation of the four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) on a monthly basis.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, Condition 11 of 6/5/1998 Permit, and Condition 10 of 2/19/1998 Permit)

D. Testing

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
 VAC 5-50-30, 9 VAC 5-80-110, Condition 5 of 2/19/1998 Permit, and Condition 3 of 6/5/1998 Permit)
- 2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method (40 CFR Part 60, Appendix A) | |
|------------------|---|--|
| VOC | EPA Methods 18, 25, 25a | |
| VOC Content | EPA Methods 24, 24a | |
| PM/PM-10 | EPA Methods 5, 17 | |
| Visible Emission | EPA Method 9 | |

V. Plant 4 Equipment Requirements

A. Limitations

 Particulate emissions from the touch-up paint booth (Unit PL4-TCH-UP) shall be controlled by paper filters.
 (9 VAC 5-80-110)

2. Visible emissions from the touch-up paint booth stack (Unit PL4-TCH-UP) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

(9 VAC 5-50-80 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. The permittee shall perform inspections of the touch-up paint booth (Unit PL4-TCH-UP) each day of operation. The inspections shall include a check of correct filter placement and filter condition. All observations and corrective actions taken shall be recorded.

(9 VAC 5-80-110)

- 2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:
 - a. Annual throughput of coatings to the touch-up paint booth (Unit PL4-TCH-UP), calculated monthly as the sum of each consecutive 12 month period.
 - b. Inspection records as required by Condition VI.B.1.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method (40 CFR Part 60, Appendix A) |
|-----------|---|
| PM/PM-10 | EPA Methods 5, 17 |

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| Visible Emission EPA Method 9 |
|-------------------------------|
|-------------------------------|

(9 VAC 5-80-110)

VI. General Coating Requirements

The following conditions are derived from 9 VAC 5 Chapter 50, Article 3. According to the Commonwealth of Virginia Air Pollution Control Board's Air Toxics Program Priority Implementation Policy, dated September 1, 1996, toxic compounds reviewed under 9 VAC 5 Chapter 50, Article 3 shall be limited to those hazardous air pollutants regulated in Section 112(b) of the Clean Air Act.

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A. Limitations

1. The permittee is limited to using the following volatile toxic compounds in its coatings, thinners, and cleaners for the paint spray booth (Unit PL1-PBP90):

| Volatile Toxic Compounds | CAS Number |
|---------------------------------|------------|
| Ethylene Glycol Monobutyl Ether | 111-76-2 |
| Ethyl Benzene | 2807-30-9 |

The permittee may use additional toxic compounds (listed in Attachment A) under 9 VAC 5-50-160 D of State Regulations without obtaining a minor new source review permit under 9 VAC 5-80-10 provided the following conditions are met:

- a. Notification shall be given to the Department (Director, Valley Region). Such notification shall be made within 15 days after the use of additional toxic compounds and shall include identification of the toxic compound, the date the toxic compound was first used, and the anticipated maximum throughput of that compound in lbs/hr and tons/yr. Additional details of the notification should be arranged with the Director, Valley Region.
- b. The permittee shall operate this facility in compliance with Rule 5-3 of State Regulations for all toxic compounds.
- c. Use of any toxic compound subject to federal regulation as a hazardous air pollutant may subject the facility to additional permitting requirements in accordance with 40 CFR 61 and 40 CFR 63.
- d. Discontinuation of previously permitted toxic compounds and the use of additional toxic compounds shall not exempt the permittee from applicable federal regulations for hazardous air pollutants under 40 CFR 61 and 40 CFR 63.
- e. A change in the coating may require a permit. If a permit is required, failure to obtain the permit prior to the change in process formulation or the use of any additional toxic compound may result in enforcement action.

(9 VAC 5-80-110 and Condition 7 of 5/3/2001 Permit)

2. Total emissions from the plastic automotive interior trim component manufacturing facility shall not exceed the limits specified below:

| Methanol | 20.7 lbs/hr | 50.9 tons/yr |
|----------|-------------|--------------|
| MIBK | 17.7 lbs/hr | 35.5 tons/yr |

Toluene 32.7 lbs/hr 87.0 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period. The sum of the emissions of the above pollutants shall not exceed the VOC limit in Condition VIII.A.

- (9 VAC 5-80-110 and Condition 4 of 1/30/2001 Permit)
- 3. The facility shall operate in compliance with Rules 4-3 and 5-3, Non-Criteria Pollutants. No changes in the facility that alter emissions of any non-criteria pollutant or cause the emission of additional non-criteria pollutants shall be made without the prior written approval of the Board.

(9 VAC 5-80-110 and Condition 12 of 10/20/1986 Permit)

B. Monitoring and Recordkeeping

- 1. The permittee shall calculate emission rates of volatile toxic compound emissions as follows:
 - a. To calculate volatile toxic compound emissions on a monthly or annual basis:

$$E_{t} = \sum_{i=1}^{n} C_{i}T_{i}$$
..... Equation 11

Where:

 E_t = Emission rate of volatile toxic compound (t) (lb/time period)

C_i = Content of toxic compound (t) in each coating, thinner, or cleaner (i) utilized in the facility during the time period (lb/gal)

 T_i = Number of gallons of each coating, thinner, or cleaner (i) utilized in the facility during the time period (gal)

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

b. To calculate average hourly emission rates:

$$VE_t = \frac{E_t}{H}$$
..... Equation 12

Where:

VE_t = average hourly emission rate for volatile toxic compound (t) (lb/hour)

E_t = emission rate of volatile toxic compound (t) (lb/month)

H = number of hours of operation for the facility during the month (hr/month)

Average hourly volatile toxic compound emissions shall be calculated once each month.

(9 VAC 5-80-110)

2. The permittee shall calculate particulate toxic compound emissions on a monthly or annual basis as follows:

$$E_{t} = \left(\sum_{i=1}^{n} P_{i} G_{i} D_{i}\right) \left(\frac{100 - T}{100}\right) \left(\frac{100 - CE}{100}\right)$$

..... Equation 13

Where:

E = emission rate for particulate toxic compound (t) (lb/time period)

 P_i = particulate toxic compound content of each coating, thinner, or cleaner (i) applied during the time period (lb solids/lb paint)

 G_i = number of gallons of each coating, thinner, or cleaner (i) applied during the time period (gal)

D_i = density of each coating (i) applied during the time period (lb/gal)

T = transfer efficiency of the paint booths (%)

= 50 [unless records demonstrate a higher value is appropriate]

CE = control efficiency of the filter (%)

= 85 [unless records demonstrate a higher value is appropriate]

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- a. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound content, water content, and solids content for each coating, thinner, and cleaner utilized in the paint spray booths (Unit PL1-PBP90).
- b. Monthly and annual throughput of each coating, thinner, and cleaner utilized in the paint spray booths (Unit PL1-PBP90). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.
- c. Average hourly and annual emissions of each toxic listed in Condition VII.A.2. Average hourly emissions shall be calculated once each month. Annual emission shall be calculated monthly as the sum of each consecutive 12 month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50, 9 VAC 5-80-110, Condition 5 of 1/30/2001 Permit, and Condition 12 of 5/3/2001 Permit)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method | |
|---|--|--|
| Hazardous Air Pollutants (HAPs) Content | 40 CFR Part 63, Appendix A, EPA Method 311 | |
| Solids Content & Density of Coatings | 40 CFR Part 60, Appendix A, EPA Method 24 | |

VII. Facility Wide Requirements

A. Limitations

Volatile Organic Compound (VOC) emissions from the existing portion [constructed prior to 11/3/1992 – Units PL1-PAINT F and PL2-PAINT] of the facility shall not exceed 178 tons per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-110 and Condition 3 of 1/30/2001 Permit)

B. Monitoring and Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

- 1. Operating/monthly material usage records for the existing facility.
- 2. Monthly and annual VOC emission rates for the existing facility. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 5 of 1/30/2001 Permit)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

| Pollutant | Test Method (40 CFR Part 60, Appendix A) | |
|-----------|--|--|
| VOC | EPA Methods 18, 25, 25a | |

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D. Reporting

- 1. The permittee shall submit reports to the Director, Valley Region, within 15 days after the end of each quarter. Each quarterly report shall contain, at minimum, the dates included in the quarter and the following:
 - a. Monthly and rolling 12 month emissions of VOC (in tons) from the existing facility.
 - b. Monthly and rolling 12 month throughputs of VOC (in tons) from the existing facility.
 - (9 VAC 5-80-110 and Condition 7 of 1/30/2001 Permit)
- 2. The permittee shall submit the following information semiannually to the Director, Valley Region:
 - a. Status of reduced production and subsequent VOC and particulate reductions on existing paint lines [constructed prior to 11/3/1992 Units PL1-PAINT F and PL2-PAINT] in the facility.
 - b. Status on the continued research for suitable water-based coatings.
 - c. Progress on the search for suitable non-VOC clean-up solvents as a part of the VOC reduction program.

(9 VAC 5-80-110 and Condition 8 of 1/30/2001 Permit)

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|----------------------|---|------------------|---|--------------------------------------|
| PL1F-OV | Drying oven for front paint line in Plant 1 | 9 VAC 5-80-720 C | - (3 VAC 3-80-120 B) | 0.16 mmBTU/hr |
| PL2-OV | Drying oven for paint operating in Plant 2 | 9 VAC 5-80-720 C | - | 0.5 mmBTU/hr |
| PL2-OV1-6 | Six curing ovens for rotocast operation | 9 VAC 5-80-720 C | - | 1.5 mmBTU/hr (each) |
| SH1-40 | Forty space heaters in Plant 1 | 9 VAC 5-80-720 C | - | 0.26 mmBTU/hr (each) |
| SH41-57 | Seventeen space heaters in Plant 2 | 9 VAC 5-80-720 C | - | 0.26 mmBTU/hr (each) |
| SH58-73 | Sixteen space heaters in Plant 3 | 9 VAC 5-80-720 C | - | 0.26 mmBTU/hr (each) |
| SH74-76 | Three space heaters in Plant 4 | 9 VAC 5-80-720 C | - | 2.817 mmBTU/hr (each) |
| SH77-78 | Two space heaters in Plant 4 | 9 VAC 5-80-720 C | - | 1.15 mmBTU/hr (each) |
| PH-1 | Process heater in Plant 3 | 9 VAC 5-80-720 C | - | 0.167 mmBTU/hr (each) |
| PL2-OV- GLUE1 | Infrared Drying/Curing Oven | 9 VAC 5-80-720 C | - | 0.504 mmBTU/hr |
| PL2-OV- GLUE2 | Infrared Drying/Curing Oven | 9 VAC 5-80-720 C | - | 0.504 mmBTU/hr |
| PL2- FOAM A | Conveyorized foam production line (Plant 2) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL2- FOAM B | Carousel foam production station (Plant 2) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL3- DN101B | Carousel foam production station using foam (Plant 3) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL3- FOAM 9B | Carousel foam production station using foam (Plant 3) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL3- FOAM 13B | Carousel foam production station using foam (Plant 3) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL3- FOAM 1A | Conveyorized foam production using foam (Plant 3) | 9 VAC 5-80-720 B | VOC HAPs | - |
| PL3- | Conveyorized foam | 9 VAC 5-80-720 B | VOC | - |

| Emission | Emission Unit | Citation | Pollutant(s) Emitted | Rated Capacity |
|-----------------|---------------------------------------|---------------------|----------------------|--------------------|
| Unit No. | Description | | (9 VAC 5-80-720 B) | (9 VAC 5-80-720 C) |
| FOAM 2A | production using white foam (Plant 3) | | HAPs | |
| PL3- | Conveyorized foam | | VOC | |
| FOAM 3A | production using | 9 VAC 5-80-720 B | HAPs | - |
| 1 01111 511 | foam (Plant 3) | | 11111 | |
| PL3- | Conveyorized foam | 9 VAC 5-80-720 B | VOC | |
| FOAM 8A | production using | | HAPs | - |
| | foam (Plant 3) | | | |
| PL3- | Conveyorized foam | 0 11 1 G 5 00 500 D | VOC | |
| FOAM 4A | production using | 9 VAC 5-80-720 B | HAPs | - |
| | foam (Plant 3) | | | |
| PL3- | Conveyorized foam | 0 VAC 5 90 730 D | VOC | |
| FOAM 6A | production using | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | foam (Plant 3) Conveyorized foam | | | |
| FOAM | production using | 9 VAC 5-80-720 B | VOC | _ |
| 10AM | foam (Plant 3) | 9 VAC 3-60-720 B | HAPs | _ |
| PL3- | Conveyorized foam | | | |
| FOAM | production using | 9 VAC 5-80-720 B | VOC | _ |
| 11A | foam (Plant 3) | 7 110 0 00 720 0 | HAPs | |
| PL1- | Injection Molding | | VOC | |
| RESIN 1 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 V A C 5 00 720 D | VOC | |
| RESIN 2 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 VAC 5 90 730 D | VOC | |
| RESIN 3 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 4 | Machine (Plant 1) | 9 VAC 3-60-720 B | HAPs | - |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 5 | Machine (Plant 1) | 7 VIIC 3 00 120 B | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 6 | Machine (Plant 1) | 7 112 0 00 720 2 | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 7 | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 8 PL1- | Machine (Plant 1) Injection Molding | | HAPs VOC | |
| RESIN 9 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 10 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 14 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | | | | |
| RESIN | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| 14A | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 19 | Machine (Plant 1) | | HAPs | - |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|----------------------|---------------------------|------------------|---|--------------------------------------|
| RESIN 20 | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 21 | Machine (Plant 1) | 9 VAC 3-80-720 B | HAPs | - |

| | T | T | <u> </u> | |
|----------|-------------------|---------------------|----------------------|--------------------|
| Emission | Emission Unit | Citation | Pollutant(s) Emitted | Rated Capacity |
| Unit No. | Description | G1441511 | (9 VAC 5-80-720 B) | (9 VAC 5-80-720 C) |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 22 | Machine (Plant 1) | 7 VAC 3-60-720 B | HAPs | _ |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 23 | Machine (Plant 1) | | HAPs | - |
| PL1- | Injection Molding | 0 VAC 5 90 730 D | VOC | |
| RESIN 24 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 VA C 5 00 700 D | VOC | |
| RESIN 25 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 XX 4 G 7 00 700 D | VOC | |
| RESIN 26 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 27 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 30 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 31 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | | | VOC | |
| | Injection Molding | 9 VAC 5-80-720 B | | - |
| RESIN 32 | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 33 | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 34 | Machine (Plant 1) | y 11100 00 7202 | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 35 | Machine (Plant 1) | 7 VIIC 3 00 720 B | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 36 | Machine (Plant 1) | 9 VAC 3-60-720 B | HAPs | _ |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 37 | Machine (Plant 1) | 9 VAC 3-60-720 B | HAPs | - |
| PL1- | Injection Molding | 0 1/4 C 5 00 720 D | VOC | |
| RESIN 38 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 V A C 5 00 720 D | VOC | |
| RESIN 39 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 0 114 G 5 00 720 D | VOC | |
| RESIN 40 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 41 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 42 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 43 | Machine (Plant 1) | | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| RESIN 44 | Machine (Plant 1) | 9 VAC 5-80-720 B | HAPs | - |
| PL1- | Injection Molding | | VOC | |
| | · · | 9 VAC 5-80-720 B | | - |
| RESIN 45 | Machine (Plant 1) | | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 46 | Machine (Plant 1) | 0.1/4.07.00.720.7 | HAPs | |
| PL1- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |

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| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|----------------------|---------------------------|----------|---|-----------------------------------|
| RESIN 47 | Machine (Plant 1) | | HAPs | |

| | T | T | <u> </u> | |
|----------|-------------------|-------------------|----------------------|--------------------|
| Emission | Emission Unit | Citation | Pollutant(s) Emitted | Rated Capacity |
| Unit No. | Description | | (9 VAC 5-80-720 B) | (9 VAC 5-80-720 C) |
| PL3- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 11 | Machine (Plant 3) | 7 VAC 3-60-720 B | HAPs | _ |
| PL3- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 12 | Machine (Plant 3) | 9 VAC 3-80-720 B | HAPs | - |
| PL3- | Injection Molding | 9 VAC 5-80-720 B | VOC | |
| RESIN 13 | Machine (Plant 3) | 9 VAC 3-60-720 B | HAPs | - |
| PL3- | Injection Molding | 0 VAC 5 90 720 D | VOC | |
| RESIN 15 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | 0 VA C 5 00 700 D | VOC | |
| RESIN 16 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | 0 XX | VOC | |
| RESIN 17 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 18 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 29 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 48 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 49 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 50 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 51 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 52 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 54 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL3- | Injection Molding | | VOC | |
| RESIN 55 | Machine (Plant 3) | 9 VAC 5-80-720 B | HAPs | - |
| PL4- | Injection Molding | | VOC | |
| RESIN 56 | Machine (Plant 4) | 9 VAC 5-80-720 B | HAPs | - |
| PL4- | Injection Molding | | VOC | |
| RESIN 57 | Machine (Plant 4) | 9 VAC 5-80-720 B | HAPs | - |
| PL4- | Injection Molding | | VOC | |
| RESIN 58 | Machine (Plant 4) | 9 VAC 5-80-720 B | HAPs | - |
| PL4- | Injection Molding | | VOC | |
| RESIN 59 | Machine (Plant 4) | 9 VAC 5-80-720 B | HAPs | - |
| l | ` ′ | | VOC | |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | | - |
| RESIN 60 | Machine (Plant 4) | | HAPs | |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 61 | Machine (Plant 4) | | HAPs | |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 62 | Machine (Plant 4) | | HAPs | |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |
| RESIN 63 | Machine (Plant 4) | | HAPs | |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | - |

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|----------------------|---------------------------|----------|---|--------------------------------------|
| RESIN 64 | Machine (Plant 4) | | HAPs | |

| Emission | Emission Unit | Give et | Pollutant(s) Emitted | Rated Capacity |
|-----------------|---|-------------------|----------------------|--------------------|
| Unit No. | Description | Citation | (9 VAC 5-80-720 B) | (9 VAC 5-80-720 C) |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 65 | Machine (Plant 4) | 7 VIIC 3-00-120 B | HAPs | _ |
| PL4- | Injection Molding | 9 VAC 5-80-720 B | VOC | _ |
| RESIN 66 | Machine (Plant 4) | 7 VIIC 3 00 720 B | HAPs | |
| PL2-VF1 | Vacuum forming (Plant 2) | 9 VAC 5-80-720 B | VOC | - |
| PL2-VF2 | Vacuum forming (Plant 2) | 9 VAC 5-80-720 B | VOC | - |
| Rotocast 1 | Production of Automotive Plastic Skin Parts (Plant 2) | 9 VAC 5-80-720 B | VOC | - |
| Rotocast 2 | Production of Automotive Plastic Skin Parts (Plant 2) | 9 VAC 5-80-720 B | B VOC - | - |
| Rotocast 3 | Production of Automotive Plastic Skin Parts (Plant 2) | 9 VAC 5-80-720 B | VOC | - |
| PL3- FOAM 3B | Carousel Acoustical Foam Production (Plant 3) | 9 VAC 5-80-720 B | VOC | - |
| PL3- FOAM 7A | Carousel Acoustical Foam Production (Plant 3) | 9 VAC 5-80-720 B | VOC | - |
| PL2- FOAM C | Conveyorized Foam Production Line (Plant 2) | 9 VAC 5-80-720 B | VOC | - |

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

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IX. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

| Citation | Title of Citation | Description of Applicability |
|-----------------|-------------------|------------------------------|
| None Identified | - | - |

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

X. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit shall become invalid five years from the date of issuance. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.

(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

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3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.

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4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Valley Region, within four daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition X.C.3. of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Valley Region, within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown.

(9 VAC 5-80-250)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or

inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

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J. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(9 VAC 5-80-110 G.4)

- 2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:
 - a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is potential of, a resulting emissions increase;
 - b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
 - c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emissions cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
 - d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
 - e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
 - f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
 - g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

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L. Duty to Submit Information

The permittee shall furnish to the Board, within a reasonable time, any information
that the Board may request in writing to determine whether cause exists for
modifying, revoking and reissuing, or terminating the permit or to determine
compliance with the permit. Upon request, the permittee shall also furnish to the
Board copies of records required to be kept by the permit and, for information
claimed to be confidential, the permittee shall furnish such records to the Board along
with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

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1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

- 2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all

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applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

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(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

- 1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.

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c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.

- d. For malfunctions that occurred for one hour or more, the permittee submitted to the Board by the deadlines described in **Failure/Malfunction Reporting** above, a notice and written statement containing a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notice fulfills the requirement of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations. (9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68. (40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)